

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )      Criminal No. 24cr10058  
v. )  
JOSE EZEQUIEL REYES-ACOSTA, )      Violations:  
Defendant )  
                                )      Count One: False Representation of Social  
                                )      Security Number  
                                )      (42 U.S.C. § 408(a)(7)(B))  
                                )      Count Two: False Statement in Application for  
                                )      Passport  
                                )      (18 U.S.C. § 1542)  
                                )      Forfeiture Allegation:  
                                )      (18 U.S.C. § 982(a)(6)(A))  
                                )

INDICTMENT

COUNT ONE

False Representation of Social Security Number  
(42 U.S.C. § 408(a)(7)(B))

The Grand Jury charges:

On or about September 11, 2020, in the District of Massachusetts, the defendant,

JOSE EZEQUIEL REYES-ACOSTA,

for the purpose of obtaining anything of value from any person, and for any other purpose, did, with intent to deceive, falsely represent a number to be the social security account number assigned by the Commissioner of Social Security to him on a Massachusetts Registry of Motor Vehicles Real ID application, when in fact such number is not the social security account number assigned by the Commissioner of Social Security to him.

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT TWO  
False Statement in Application for Passport  
(18 U.S.C. § 1542)

The Grand Jury further charges:

On or about March 27, 2018, in the District of Massachusetts, the defendant,

JOSE EZEQUIEL REYES-ACOSTA,

willfully and knowingly made a false statement in an application for a passport with intent to induce and secure for his own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that in such application the defendant claimed to be a United States citizen assigned Social Security number xxxx-xx-0924, and claimed his date of birth was xx/xx/1985, which statements he knew to be false.

All in violation of Title 18, United States Code, Section 1542.

FORFEITURE ALLEGATION  
(18 U.S.C. § 982(a)(6)(A))

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 1542, set forth in Count Two, the defendant,

JOSE EZEQUIEL REYES-ACOSTA,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(6): (i) any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense; and (ii) any property, real or personal, that constitutes or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense; and that was used to facilitate, or was intended to be used to facilitate, the commission of the offense.

2. If any of the property described in paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 982(a)(6)(A), as a result of any act or omission of the defendant –

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of all other property of the defendant up to the value of the property described in paragraph 1, above.

All pursuant to Title 18, United States Code, Section 982(a)(6)(A).

A TRUE BILL

*Karen Pentemps*  
FOREPERSON



JAMES J. NAGELBERG  
SPECIAL ASSISTANT UNITED STATES ATTORNEY  
DISTRICT OF MASSACHUSETTS

District of Massachusetts: March 7, 2024  
Returned into the District Court by the Grand Jurors and filed.

/s/ Noreen A. Russo  
DEPUTY CLERK  
2:14 PM

